



COMMONWEALTH of VIRGINIA

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SUBJECT: DRAFT 3rd Technical Advisory Committee (TAC) Meeting to
Discuss the 2013 Reissuance of 9VAC25-193 General Virginia Pollutant
Discharge Elimination System (VPDES) Permit Regulation for Concrete Products
Facilities
TO: TAC Members and DEQ Staff (listed below)
FROM: Elleanore Daub, VPDES DEQ Central Office
DATE: July 25, 2012

A TAC meeting was held on July 10, 2012 at the DEQ Piedmont Regional Office. The meeting began at 9:30 AM. The TAC members attending the meeting were:

Name	Organization
Walter Beck	Vulcan Materials
Cliff Bocchicchio	Titan
Tom Foley	Vulcan Materials
David Holsinger	Precast Concrete Association of Virginia
Fred Cunningham	DEQ - CO VPDES
Elleanore Daub	DEQ - CO VPDES
Burt Tuxford	DEQ - CO VPDES

Other DEQ Staff Participating

Janine Howard	DEQ – PRO
Carl Thomas, Steve Long	DEQ – TRO
Kathleen OConnell	DEQ - CO Enforcement
Mark Trent,	DEQ – SWRO by conf. call
Bob Tate and Gerry Duff	DEQ – BRRO by conf. call

Items presented prior to the meeting for discussion were:

- Draft Regulation with amendments dated June 29, 2012

Discussion

There were no objections to the June 7, 2012 meeting summary. This will be finalized on the Town Hall web site.

Definitions Best Management Practices -

Use definition from 2008 EPA Multi-Sector General Permit.

Definition Vehicle/Equipment Maintenance -

Write definition to ensure this is for degreasing equipment and not washing sediments or concrete residue from trucks (with or without detergent). Use consistent definition in the rest of the regulation when referring to degreasing and TPH limits.

Registration Statement -

Ask which outfall the vehicle or equipment degreasing and cooling water is discharged from.

Some TAC members think flow is unnecessary and difficult to estimate. Flow is not in the EPA Multi-Sector GP or in the DEQ ISWGP.

For representative outfalls - ask for the same information that is in Part II B Storm Water Management (location of outfalls, why they are identical, estimate drainage area, estimate runoff coefficient of drainage areas). The TAC thought it was better to approve the representative outfalls 'up front' during the registration process rather than explained on the DMR(s) as the existing Part II B requires. The TAC wants DEQ to think about whether a DMR is needed for every outfall or just the representative outfall. The industry thought one DMR was sufficient but DEQ has to determine how the other outfalls can be tracked in their data base. An alternative is to continue with multiple DMRs for each similar outfall but just report data on the representative outfall DMR.

Consider rolling the due date for registrations back another 30 days (to July 1 2013) in order to give time for TMDL staff review.

It was decided that asking for portable plan closure plans up front was OK but change 'Removal of structure, equipment, piping and appurtenances' to 'Fate and disposition of structure, etc....' It is preferred that portable plants get coverage under the concrete GP and not the construction storm water GP. Portable plants should be held to the same requirements as fixed facilities.

Effluent Limits Pages - TAC decided a definition of 'process wastewater' was not needed but we should include vehicle wash water in process water description in Part I A and the proper terminology for equipment degreasing.

TAC discussed whether iron should be added as a monitoring requirement as was suggested by RO staff since storm water might be present and iron was a required storm water monitoring parameter in the 2008 permit. The TAC concluded that no, this effluent limits page was for process water NOT storm water. Plus we decided to take iron out altogether from the storm water monitoring page because we have years of iron data and have no water quality or technology reason to require reductions. Iron occurs in the soil and cement in similar quantities.

Part I A 2 - TAC discussed whether non-contact cooling water effluent limits page was needed. It was decided to leave it in as block and brick facilities may have non-contact cooling water.

Part 1 A 3 Storm water - Instead of 'discharge limitations' changed to 'benchmark monitoring' to match industrial storm water general permit terminology. There was discussion about the benchmark monitoring footnote 3 which describes that happens when a benchmark is exceeded. This wording was copied from the 2009 Industrial Storm Water General Permit Part I A 1 b - 'Benchmark monitoring of discharges associated with specific industrial activities.' Some adjustments were made to the wording in the first sentence. Staff wanted to say that modifications to the SWPPP 'are' necessary, rather than 'may be' necessary when benchmarks concentrations are exceeded since there are two opportunities to explain why the modifications are not

necessary (in the routine facility inspection or the comprehensive site compliance evaluation). The closing sentence that suggested that exceedance of benchmark concentrations may identify the need for an individual, or alternative general permit, was rejected by the TAC. Discussion ensued as to whether benchmark monitoring values should not apply at high rainfall intensities (e.g. above the 50 year 12 hours intensity). No consensus was reached.

Several TAC members suggested removing the iron benchmark. We have years of data that show iron is often greater than 1.0 mg/l (the benchmark value) and nothing has been done with that information. Data was submitted that show

It was suggested that the monitoring requirements in the footnotes of Part I A 3 (Storm Water benchmark page) all get moved to the monitoring instructions in Part II Storm Water Management.

Part I B - Special Conditions

Freeboard - Most of the TAC members were OK with this condition.

Liners of settling ponds - consensus was that older basins 'grandfathered' prior to February 2, 1998 should be lined if the pond configuration is changed (expanded or improved).

Dust suppression - consensus was to remove the phrase about keeping aggregates in the surface dry condition

QLs - Consensus on 1.0 mg/l for TSS and 5.0 mg/l for TPH.

Storm Water Management -

Representative Outfalls - Paragraph rewritten such that drainage area information is required but not required to be of similar size. The need to submit substantially identical outfall information with the DMR was deleted, rather just in the SWPPP and in the registration statement. DMR submittals for representative outfalls industry prefers to submit just one.

Sampling Waivers - Inactive and unstaffed site waivers are not just for storm water monitoring (process at entire sites can often go inactive). The industry asks that inactive sites should not have to submit DMRs.

Consider placing all sampling waivers in one section.

Thanks to all the TAC members for their continued service.